

JAP:MKM

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**M-11-931**

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

RICHIE CORREA-MODERO,

(T. 21, U.S.C.,  
§§ 841(a)(1) and  
841(b)(1)(A)(ii)(II))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

EDWARD RAPP, being duly sworn, deposes and states that he is a Detective with the Port Authority Police Department, deputized to the Drug Enforcement Administration Task Force, duly appointed according to law and acting as such.

Upon information and belief, on or about September 15, 2011, within the Eastern District of New York and elsewhere, the defendant RICHIE CORREA-MODERO did knowingly, intentionally and unlawfully possess with intent to distribute a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(ii)(II)).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this affidavit is merely to establish probable cause, I have not set forth all of the facts and circumstances of which I am aware.

1. On or about September 15, 2011, the defendant RICHIE CORREA-MODERO arrived at JFK International Airport ("JFK") in Queens, New York aboard American Airlines flight no. 1416 from San Juan, Puerto Rico.

2. The undersigned and another agent approached the defendant RICHIE CORREA-MODERO in Terminal 8 of JFK. After identifying ourselves and asking him a series of routine questions, I and the other agent asked the defendant if the carry-on bag he was carrying was his own and if he had packed it himself. He responded affirmatively to both questions. We then asked the defendant for consent to search the carry-on bag. The defendant gave consent.

3. The search of the defendant's carry-on bag revealed, among other things, 10 bricks containing a white, powdery substance that field-tested positive for the presence of cocaine. The approximate gross weight of the bricks recovered from the defendant's luggage is 10 kilograms.

4. The defendant RICHIE CORREA-MODERO was placed under arrest and advised of his Miranda rights, which he waived in writing. He then stated, in sum and substance, that he knew he was transporting narcotics and that he understood that he would be paid approximately \$10,000 for doing so.

WHEREFORE, your deponent respectfully requests that the defendant RICHIE CORREA-MODERO be dealt with according to law.



EDWARD RAPP  
Detective  
Port Authority Police Department  
Drug Enforcement Administration Task Force

Sworn to before me this  
16th day of September, 2011

HONORABLE  
UNITED STATES  
EASTERN DISTRICT OF NEW YORK



S. Orenstein